

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

CSX TRANSPORTATION, INC.,
individually and on behalf
Of NORFOLK & PORTSMOUTH BELT
LINE RAILROAD COMPANY,

Plaintiff,

v.

CIVIL ACTION NO.
2:18cv530

NORFOLK SOUTHERN RAILWAY COMPANY,
et al.,

Defendants.

Videotaped Deposition of TONY INGRAM
Conducted Virtually
Wednesday, November 18, 2020
9:36 a.m. EST

Job No. CS4338549

1 A. That's what it says, provide competitive
2 access.

3 Q. And when you wrote this letter was it your
4 position as a Belt Line director that the import/export
5 rate charged by the Belt Line at that time was -- did
6 not provide competitive access?

7 A. I don't have the details. I don't
8 remember what happened 14 years ago.

9 Q. Okay.

10 A. A lot of numbers had to go in to crunch
11 out 148 -- \$148. I mean, I can't tell you what was
12 behind that at this time.

13 Q. All right. Let's turn to page 2 of
14 Exhibit 7. The first paragraph on page 2 refers to or
15 summarizes some of CSX's -- CSX intermodal's business
16 plans, and says that the business plan calls for
17 aggressive growth in its exchange of container traffic
18 with steamship lines calling on NIT, and failure to
19 provide a competitive tariff rate will eliminate the
20 possibility of significant -- of a significant line of
21 CSXT business, all of which could substantially increase
22 the revenues and profitability of NPBL.

23 Are you with me, sir?

24 A. Yes.

25 Q. All right. So what was your understanding